

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262-NRB ECF Case
The OTC Action	Honorable Naomi R. Buchwald

**OTC PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL
OF SETTLEMENTS WITH DEUTSCHE BANK AKTIENGESELLSCHAFT AND HSBC
BANK PLC**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on a date and at a time to be determined by the Court, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, in the Courtroom of the Honorable Naomi Reice Buchwald, OTC Plaintiffs will, and hereby do, move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order: (a) granting final approval to the Settlements with Deutsche Bank Aktiengesellschaft (“Deutsche Bank”) and HSBC Bank plc (“HSBC”); (b) certifying the Settlement Classes, (c) granting final approval to the joint plan of distribution; (d) appointing Hausfeld LLP and Susman Godfrey LLP as Co-Lead Counsel for the Settlement Classes; (e) granting final approval to the joint class notice, and for such other and further relief as the Court deems appropriate.

Submitted herewith in support of OTC Plaintiffs’ Motion for Final Approval of Settlements with Deutsche Bank and HSBC are (i) the Memorandum of Law in Support of OTC Plaintiffs’ Motion for Final Approval of Settlements with Deutsche Bank Aktiengesellschaft and HSBC Bank plc; (ii) the Declaration of Michael D. Hausfeld in Support of OTC Plaintiffs’ Motion for Final Approval of Settlements with Deutsche Bank Aktiengesellschaft and HSBC Bank plc; (iii) the Declaration of Shannon Wheatman in Support of Final Approval for the Joint Notice Program; and (iv) the Declaration of Jason Rabe Regarding Notice by Mailing and Publication of the Publication and Internet Notices.¹

Dated: August 24, 2018

/s/ Michael D. Hausfeld
Michael D. Hausfeld
Hilary Scherrer

/s/ William Christopher Carmody
William Christopher Carmody
Arun Subramanian

¹ OTC Plaintiffs will submit a Proposed Order after the opt-out deadline (September 28, 2018) and in advance of the Fairness Hearing (October 25, 2018).

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Interim Co-Lead Counsel for the Over-the-Counter Class

CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2018, I caused the foregoing, along with the accompanying memorandum and declarations in support, to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

August 24, 2018.

/s/ Hilary K. Scherrer
Hilary K. Scherrer